

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- v. -

NG LAP SENG,

Defendant.

No. 15 Cr. 00706 (VSB)

**DECLARATION OF TAI H. PARK IN
SUPPORT OF MOTION TO COMPEL
DISCOVERY**

Pursuant to Title 28 U. S. C. Section 1746, I, TAI H. PARK, declare under penalty of perjury that the following is true and correct:

1. I am a partner in the law firm of Park Jensen Bennett LLP, co-counsel to Defendant Ng Lap Seng (“Mr. Ng”) in the above-captioned action, and respectfully submit this Declaration in support of the accompanying Motion to Compel Discovery, dated August 11, 2016.

2. Attached hereto as Exhibit A is a true and correct copy of the Discovery Letter I sent to the government in the above-captioned action, dated July 22, 2016.

3. Attached hereto as Exhibit B is a true and correct copy of the government’s response to our Discovery Letter, dated August 8, 2016.

4. Attached hereto as Exhibit C is a true and correct copy of Report (A/70/783) of the Secretary-General’s Task Force on the functioning of the Office of the President of the General Assembly, dated March 29, 2016.


5. Attached hereto as Exhibit D is a true and correct copy of the Discovery Letter Hugh Mo sent to the United Nations in the above-captioned action, dated July 29, 2016. No representative of the United Nations has responded to this letter.

6. Attached hereto as Exhibit E is a true and correct copy of a draft transcript prepared by my firm of the post-arrest interview of Mr. Ng conducted by the FBI. The draft is dated August 10, 2016, but the interview was conducted on September 19, 2015.

7. Attached hereto as Exhibit F is a true and correct copy of the brochure prepared for the High-Level Multi-Stakeholder Strategy Forum held in Macau on August 25 – 26, 2015.

8. In accordance with Local Rule 16.1, I confirm that on August 1, 2016 I conferred in good faith with the government regarding the requests contained in the Discovery Letter (Exhibit A). We were unable to reach agreement with regard to the requests, as outlined in our Memorandum in Support of the Motion to Compel, and now on behalf of Mr. Ng, I ask the Court to resolve the outstanding discovery issues.

Dated: August 11, 2016
New York, New York

A handwritten signature in black ink, appearing to read 'Tai H. Park', is written over a horizontal line.

Tai H. Park